

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

SARINA ERVIN,)	
)	
Petitioner,)	
)	Case Number: 20-cv-0606
v.)	
)	Removed from the Circuit Court of
RAYMOND ERVIN,)	Lake County, Illinois,
)	Case No. 2004 D 1943
Respondent.)	

PETITIONER'S MOTION FOR COSTS AND FEES

For the reasons set forth in her Memorandum in Support of its Motion for Costs and Fees, Petitioner, SARINA ERVIN, respectfully moves this Court for an order requiring Respondent, RAYMOND ERVIN, to pay Petitioner's just costs and actual expenses, including attorneys' fees in the amount of **\$7,875.00**, as a result of Respondent's improper removal of this action.

Dated: November 18, 2020

Respectfully submitted,

SARINA ERVIN

By: /s/ Matthew D. Elster
One of Her Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of November, 2020, a copy of the foregoing ***Motion For Costs and Fees*** was filed via the court's CM/ECF system, which will send electronic notice to all counsel of record who have appeared in this case.

/s/ Matthew D. Elster